

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF HELIOS
VENTURES FZE FOR AN ORDER TO
TAKE DISCOVERY FOR USE IN
FOREIGN PROCEEDINGS PURSUANT
TO 28 U.S.C. § 1782

Case No. 21-MC _____

**APPLICATION AND PETITION FOR AN ORDER TO CONDUCT DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

Petitioner Helios Ventures FZE (“Petitioner”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit 1 to the Declaration of Lucas Bento dated May 5, 2021 (the “Bento Declaration”) authorizing Petitioner to take discovery for use in contemplated civil proceedings in the United Kingdom and Malta in the form of the subpoenas attached as Exhibit 2 to the Bento Declaration. In support of its application and petition, Petitioner submits a Memorandum of Law and attaches the Declaration of James Drake QC dated May 5, 2021, the Declaration of Advocate Doctor Louis Cassar Pullicino dated May 3, 2021, and the Bento Declaration.

Dated: May 5, 2021

Respectfully submitted,

/s/ Peter Calamari

Peter Calamari
Lucas V.M. Bento
Colin Steele
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, Floor 22
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
petercalamari@quinnmanuel.com
lucasbento@quinnmanuel.com
colinsteele@quinnmanuel.com

Attorneys for Petitioner